

United States Environmental Protection Agency
Region II
POLLUTION REPORT

Date: Friday, April 01, 2005

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Subject:
Westwood Chemical
46 Tower Road, Middletown, NY
Latitude: 41.4687500
Longitude: -74.3772800

POLREP No.:	1	Site #:	WN
Reporting Period:		D.O. #:	13
Start Date:	3/3/2005	Response Authority:	CERCLA
Mob Date:	3/8/2005	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:		Contract #	EP-W-04-055
RCRIS ID #:	NYD072715052		

Site Description

Westwood Chemical Corporation located at 46 Tower Drive, City of Middletown, Town of Wallkill, Orange County, New York 10941, manufactured two distinct product lines. Their primary product line, accounting for approximately 80% of their business, was the manufacture of active ingredients used in antiperspirant. Their secondary line was the manufacture of flocculent agents used in municipal water treatment facilities.

According to past employees, the company was established in 1974, it is not clear if the original plant was located at 46 Tower Drive. At their peak, Westwood employed over 100 people and ran a 24 hour operation with two shifts.

Some time in late 2000 early 2001 the company started to encounter financial difficulties, culminating with filing Chapter 7 bankruptcy in January 2005. According to on employee, Westwood closed its doors on October 25, 2005.

As a result of the Assistant Code Enforcement Officer for the Town of Wallkill noting employees packing their belongings into their vehicles an inspection, along with Orange County Hazardous Materials Response Team, was conducted on February 10, 2005. Upon noting various bulk storage tanks, intermediate bulk containers (IBC) also referred to as totes, three onsite laboratory rooms and a basement with numerous laboratory sized containers including petroleum and organic ethers, the Assistant Code Enforcement Officer notified the New York State Department of Environmental Conservation (NYSDEC). NYSDEC had the power restored through the bankruptcy trustee and through their spill contractor restaged totes and drums from outdoor storage yards to the warehouse portion of the building. NYSDEC also established 24-hour site security.

In a letter dated February 22, 2005, NYSDEC requested that the U.S. Environmental Protection Agency (EPA) conduct a time-critical removal action pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). On March 01, 2005, three On-Scene Coordinators (OSCs) from EPA Region II conducted a site walk through. As a result of the walk through, verbal authorization was sought and received on March 02, 2005 to transfer the site security services and continue with site stabilization activities.

There are 76 bulk storage tanks (some which are known to be empty and others yet have to be inspected to determine if they contain material), in excess of 400 totes (275 gallon capacity), in excess of 2,000 laboratory sized chemical containers and approximately 3,500 tones of solid (primarily finished and off-spec products; however, there are also raw materials) present on site. Many of the totes and bulk storage tanks are believed to contain wastewater from the manufacturing process.

Current Activities

On March 03, 2005, one of EPA Region II's Emergency and Rapid Response Services (ERRS) contractor was activated to assume the site security. On March 08, 2005, ERRS and EPA mobilized to the site to continue site stabilization activities initiated by NYSDEC.

The ERRS crew continued the restaging of the totes from the outdoor staging areas to the warehouse portion of the building. This phase of the activity has been completed.

On March 14, 2005 a Polyvinyl Chloride (PVC) elbow joint from one of the outdoor reactor vessels began leaking. The crew replaced the defective pipe with a blank flange to secure the release

On March 16 and 17, 2005 onsite interviews were conducted with two past employees of Westwood, a plant manager and an Environmental Safety Coordinator/R&D.

The US Coast Guard's Atlantic Strike Team (AST) was activated on March 21, 2005.

On March 23, 2005 an on-site meeting was held with local and State officials to brief the attendees with the course of action selected by EPA and describe current conditions and potential risks to nearby people and the environment. Discussions were also had regarding potential actions to be taken in the event of a release or injury to site personnel. The meeting was attended by the Assistant Code Enforcement Officer, local Fire Department, ambulance service, Orange County

Hazardous Materials Team and NYSDEC.

ERRS crew began the process of packing up small sample containers and files found throughout the office spaces.

On March 25, 2005 one of the indoor metal reactor vessels believed to contain wastewater began leaking. The contents were transferred to an empty tank allocated to bulk wastewater from the totes.

The process of transferring the material contained inside the totes into empty bulk storage tanks was initiated on March 28, 2005.

On March 31, 2005, the Silver Lake Fire Department Chief and the Orange County Hazardous Material Team Chief visited the site to pickup site maps, inventory lists and MSDS sheets and to tour the current status of the site.

On April 01, 2005 several fractures in the secondary containment wall were noticed. The accumulated rainwater and possible wastewater was seeping from the fractures. The crew transferred the contents into a empty tank. Approximately 18,000 gallons were transferred

Next Steps

The continued transfer of material contained in totes to bulk storage containers

Boxing of files in the office space and packing of sample jars contained in the offices for later lab-packing.

Discrete sampling of totes and bulk storage tanks to determine if they will be categorized as Resource Conservation and Recovery Act (RCRA) hazardous waste will be undertaken. The reason being that through reviewing of analytical data of the wastewater conducted by Westwood, chromium and lead were present in the wastewater, though not at levels deemed RCRA hazardous waste. The Westwood, according to one employee, analyses of wastewater was performed after the storage tanks were filled; dilution might have taken place.

A joint Site Health and Safety Audit will be conducted by EPA and ERRS during the week of April 4th.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$200,000.00	\$100,000.00	\$100,000.00	50.00%
USCG	\$25,000.00	\$4,000.00	\$21,000.00	84.00%
Intramural Costs				
USEPA - InDirect	\$25,000.00	\$5,000.00	\$20,000.00	80.00%

Total Site Costs	\$250,000.00	\$109,000.00	\$141,000.00	56.40%
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* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

epaosc.org/westwood